

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

v.

GORDON J. COBURN and  
STEVEN SCHWARTZ

Hon. Kevin McNulty

Crim. No. 19-cr-120 (KM-MAH)

**NOTICE OF DEFENDANT GORDON J. COBURN'S MOTION  
TO COMPEL *BRADY* SEARCHES, TO SUPPRESS, AND FOR  
OTHER RELIEF**

**PLEASE TAKE NOTICE** that Defendant Gordon J. Coburn hereby moves before the Honorable Kevin McNulty, United States District Judge for the District of New Jersey, at such time as the Court determines, for an Order compelling the government to search Cognizant Technology Solutions Corporation's ("Cognizant") files for *Brady* material; to suppress any statements made by Coburn during Cognizant's interview, as well as any evidence derived from those statements; and for such other relief as is required.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Defendant respectfully relies upon the Memorandum of Law in Support of Defendant Gordon J. Coburn's Motion to Compel *Brady* Searches, to Suppress, and

for Other Relief (the “Brief”) and the Certification of Nicholas J. Lewin, with exhibits. The Brief and the exhibits appended to the Certification of Nicholas J. Lewin will be submitted under seal to the Clerk of Court. Defendant will then meet and confer with counsel for the Government and Cognizant regarding the extent to which any redactions to or permanent sealing of those materials is necessary and will thereafter file on the public docket appropriate versions of Defendant’s Brief and the exhibits appended to the Certification of Nicholas J. Lewin.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

**PLEASE TAKE FURTHER NOTICE** that a proposed Order and a certificate attesting to the date and manner of service are submitted herewith.

Dated: July 8, 2022

Respectfully submitted,

/s/ Nicholas J. Lewin

Nicholas J. Lewin

Henry L. Ross

KRIEGER KIM & LEWIN LLP

500 Fifth Avenue

New York, NY 11215

(212) 390-9559

*Attorneys for Defendant Gordon J.  
Coburn*